

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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In re:

ENVISION HEALTHCARE CORPORATION,  
*et al.*,<sup>1</sup>

Reorganized Debtors.

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)  
) Chapter 11  
)  
) Case 23-90342 (CML)  
)  
)  
) (Jointly Administered)  
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**REORGANIZED DEBTORS' MOTION FOR ENTRY OF A  
FINAL DECREE CLOSING CERTAIN OF THE CHAPTER 11 CASES**

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**If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this application was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this application was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.**

The above-captioned reorganized debtors (collectively, the “Reorganized Debtors,” and before the Effective Date<sup>2</sup> of the Plans, collectively, the “Debtors”) state as follows in support of this motion:

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<sup>1</sup> A complete list of each of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/Envision>. The Reorganized Debtors’ service address is 1A Burton Hills Boulevard, Nashville, Tennessee 37215.

<sup>2</sup> Capitalized terms not otherwise defined herein have the meanings ascribed to such terms in the *Third Amended Joint Chapter 11 Plan of Reorganization of the AmSurg Debtors (Technical Modifications)* [Docket No. 1650] (as may be amended, supplemented, or otherwise modified from time to time, and including all exhibits thereto, the “AmSurg Plan”) or the *Third Amended Joint Chapter 11 Plan of Reorganization of the EVPS Debtors (Technical Modifications)* [Docket No. 1651] (as may be amended, supplemented, or otherwise modified from time to time, and including all exhibits thereto, the “EVPS Plan,” and, together with the AmSurg Plan, the “Plans”) or the Confirmation Orders (defined below), as applicable.

### **Relief Requested**

1. The Reorganized Debtors seek entry of a final decree, substantially in the attached form (the “Final Decree”), (a) closing each of the Debtors’ Chapter 11 Cases other than the case of ED Solutions, LLC, Case No. [23-90367] (the “Remaining Case”), and (b) granting related relief.

### **Jurisdiction and Venue**

2. The United States Bankruptcy Court for the Southern District of Texas (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). The Reorganized Debtors confirm their consent to the entry of a final order by the Court.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The bases for the relief requested herein are sections 105(a) and 350(a) of title 11 of the United States Code (the “Bankruptcy Code”), rule 3022 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rules 1075-1 and 9013-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”).

### **Background**

5. On May 15, 2023, each Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code.<sup>3</sup> The same day, the Court entered an order [Docket No. 61] authorizing

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3 A detailed description of the facts and circumstances of these Chapter 11 Cases is set forth in the *Declaration of Paul Keglevic, Chief Restructuring Officer of Envision Healthcare Corporation, in Support of the Debtors’ Chapter 11 Petitions* [Docket No. 2] and the *Declaration of Dennis Stogsdill, Managing Director of Alvarez & Marsal North America, LLC, in Support of (I) the Debtors’ First Day Motions and (II) the Debtors’ Emergency Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to Use Cash Collateral, (B) Granting Adequate Protection to Prepetition Secured Parties, (C) Scheduling a Final Hearing, (D) Modifying the Automatic Stay, and (E) Granting Related Relief* [Docket No. 3], detailing the facts and circumstances of these Chapter 11 Cases.

the joint administration of these Chapter 11 Cases under the case of Envision Healthcare Corporation, Case No. 23-90342 (the “Lead Case”). The Chapter 11 Cases other than the Lead Case are as follows:

<b>Affiliate Debtors</b>	<b>Case No.</b>
Acute Management, LLC	23-90341
Affilion, Inc.	23-90538
All Women’s Healthcare Holdings, Inc.	23-90540
All Women’s Healthcare of Dade, Inc.	23-90542
All Women’s Healthcare of Sawgrass, Inc.	23-90543
All Women’s Healthcare of West Broward, Inc.	23-90544
All Women’s Healthcare Services, Inc.	23-90547
All Women’s Healthcare, Inc.	23-90549
AllegiantMD, Inc.	23-90550
Alpha Physician Resources, L.L.C.	23-90551
American Emergency Physicians Management, Inc.	23-90552
AmSurg Abilene Eye, Inc.	23-90553
AmSurg Abilene, Inc.	23-90554
AmSurg Altamonte Springs FL, Inc.	23-90555
AmSurg Anesthesia Management Services, LLC	23-90556
AmSurg Arcadia CA, Inc.	23-90348
AmSurg Burbank, Inc.	23-90355
AmSurg Colton CA, Inc.	23-90362
AmSurg Crystal River, Inc.	23-90369
AmSurg EC Beaumont, Inc.	23-90378
AmSurg EC Centennial, Inc.	23-90385
AmSurg EC Santa Fe, Inc.	23-90394
AmSurg EC St. Thomas, Inc.	23-90401
AmSurg EC Topeka, Inc.	23-90409
AmSurg EC Washington, Inc.	23-90419
AmSurg El Paso, Inc.	23-90429
AmSurg Escondido CA, Inc.	23-90439
AmSurg Finance, Inc.	23-90446
AmSurg Fresno Endoscopy, Inc.	23-90454
AmSurg Glendale, Inc.	23-90386
AmSurg Glendora CA, Inc.	23-90416

AmSurg Hillmont, Inc.	23-90433
AmSurg Holdco, LLC	23-90450
AmSurg Holdings, LLC	23-90464
AmSurg Inglewood, Inc.	23-90482
AmSurg KEC, Inc.	23-90491
AmSurg Kissimmee FL, Inc.	23-90497
AmSurg La Jolla, Inc.	23-90500
AmSurg Lancaster PA, LLC	23-90504
AmSurg Main Line PA, LLC	23-90510
AmSurg Maryville, Inc.	23-90512
AmSurg Melbourne, Inc.	23-90517
AmSurg Miami, Inc.	23-90519
AmSurg Naples, Inc.	23-90372
AmSurg New Port Richey FL, Inc.	23-90391
AmSurg Northwest Florida, Inc.	23-90415
AmSurg Oakland CA, Inc.	23-90432
AmSurg Ocala, Inc.	23-90456
AmSurg Palmetto, Inc.	23-90480
AmSurg Physicians Arizona, LLC	23-90494
AmSurg Physicians HoldCo, LLC	23-90501
AmSurg Pottsville PA, LLC	23-90506
AmSurg San Antonio TX, Inc.	23-90514
AmSurg San Luis Obispo CA, Inc.	23-90545
AmSurg Scranton PA, Inc.	23-90525
AmSurg Suncoast, Inc.	23-90528
AmSurg Temecula CA, Inc.	23-90531
AmSurg Temecula II, Inc.	23-90345
AmSurg Torrance, Inc.	23-90353
AmSurg, LLC	23-90343
Anesthesiologists of Greater Orlando, Inc.	23-90364
Anesthesiology Associates of Tallahassee, Inc.	23-90373
Apex Acquisition LLC	23-90381
APH Laboratory Services, Inc.	23-90396
Arizona Perinatal Care Centers, LLC	23-90407
ASDH I, LLC	23-90417
ASDH II, LLC	23-90425
Austin NSC, LLC	23-90431

Austin NSC, LP	23-90442
Bay Area Anesthesia, L.L.C.	23-90452
BestPractices, Inc.	23-90463
Bethesda Anesthesia Associates, Inc.	23-90475
Boca Anesthesia Service, Inc.	23-90349
Bravo Reimbursement Specialist, L.L.C.	23-90358
EMSC ServicesCo, LLC	23-90377
Broad Midwest Anesthesia, LLC	23-90366
Centennial Emergency Physicians, LLC	23-90374
Chandler Emergency Medical Group, L.L.C.	23-90383
Children's Anesthesia Associates, Inc.	23-90395
Clinical Partners Management Company, LLC	23-90404
CMORx, LLC	23-90411
Coastal Anesthesiology Consultants, LLC	23-90421
Coral Springs NSC, LLC	23-90428
Davis NSC, LLC	23-90438
Desert Mountain Consultants in Anesthesia, Inc.	23-90449
Discovery Clinical Research, Inc.	23-90459
Doctors Billing Service, Inc.	23-90469
Drs. Ellis, Rojas, Ross & Debs, Inc.	23-90359
EDIMS, L.L.C.	23-90380
EHR Management Co.	23-90392
EmCare Anesthesia Providers, Inc.	23-90406
EmCare HoldCo, LLC	23-90448
EmCare Holdings, LLC	23-90470
EmCare of California, Inc.	23-90493
EmCare Physician Providers, Inc.	23-90516
EmCare Physician Services, Inc.	23-90534
EmCare, LLC	23-90523
Emergency Medical Services LLC	23-90526
Emergency Medicine Education Systems, Inc.	23-90529
EMS Management LLC	23-90530
Enterprise Intermediate Holdings Inc.	23-90389
Enterprise Parent Holdings, Inc.	23-90402
Envision Anesthesia Services of Delaware, Inc.	23-90414
Envision Anesthesia Services of Sierra Vista, Inc.	23-90426

Envision Children's Healthcare Services of North Mississippi, Inc.	23-90455
Envision Healthcare Clinical Research, Inc.	23-90471
Envision Healthcare Scientific Intelligence, Inc.	23-90489
Envision Physician Services, LLC	23-90498
Evolution Mobile Imaging, LLC	23-90502
Flamingo Anesthesia Associates, Inc.	23-90505
FM Healthcare Services, Inc.	23-90509
FMO Healthcare Holdings, LLC	23-90511
FO Investments II, Inc.	23-90515
FO Investments III, Inc.	23-90507
FO Investments, Inc.	23-90520
Fullerton NSC, LLC	23-90524
Global Surgical Partners, Inc.	23-90527
Greater Florida Anesthesiologists, LLC	23-90532
Gynecologic Oncology Associates, Inc.	23-90533
Hawkeye Holdco LLC	23-90535
Healthcare Administrative Services, Inc.	23-90536
Holiday Acquisition Company, Inc.	23-90537
Illinois NSC, Inc.	23-90539
Imaging Advantage LLC	23-90541
Infinity Healthcare, Inc.	23-90557
iSelect Healthcare LLC	23-90546
Jacksonville Beaches Anesthesia Associates, Inc.	23-90548
Jupiter Anesthesia Associates, L.L.C.	23-90347
Jupiter Healthcare, LLC	23-90352
Kenwood NSC, LLC	23-90361
KMAC, Inc.	23-90368
Long Beach NSC, LLC	23-90379
MedAssociates, LLC	23-90390
Medi-Bill of North Florida, Inc.	23-90398
Medical Information Management Solutions, LLC	23-90413
Millennium Vision Surgical, LLC	23-90427
MSO Newco, LLC	23-90437
NAC Properties, LLC	23-90445
New Generations Babee Bag, Inc.	23-90458
North Florida Anesthesia Consultants, Inc.	23-90468

North Florida Perinatal Associates, Inc.	23-90478
Northwood Anesthesia Associates, L.L.C.	23-90351
NSC Healthcare, Inc.	23-90356
NSC RBO East, LLC	23-90363
NSC West Palm, LLC	23-90370
Parity Healthcare, Inc.	23-90382
Partners in Medical Billing, Inc.	23-90393
Phoenix Business Systems, LLC	23-90405
Phoenix Physicians, LLC	23-90418
Physician Account Management, Inc.	23-90434
Physician Office Partners, Inc.	23-90443
Pinnacle Consultants Mid-Atlantic, L.L.C.	23-90453
Practice Account Management Services, LLC	23-90466
Proven Healthcare Solutions of New Jersey, LLC	23-90479
Provider Account Management, Inc.	23-90486
QRx Medical Management, LLC	23-90346
Radiology Staffing Solutions, Inc.	23-90354
Radstaffing Management Solutions, Inc.	23-90365
Reimbursement Technologies, Inc.	23-90375
Rose Radiology, LLC	23-90387
San Antonio NSC, LLC	23-90400
Sentinel Healthcare Services, LLC	23-90412
Sheridan Anesthesia Services of Alabama, Inc.	23-90424
Sheridan Anesthesia Services of Louisiana, Inc.	23-90436
Sheridan Anesthesia Services of Virginia, Inc.	23-90447
Sheridan CADR Solutions, Inc.	23-90461
Sheridan Children's Healthcare Services of Arizona, Inc.	23-90474
Sheridan Children's Healthcare Services of Kentucky, Inc.	23-90485
Sheridan Children's Healthcare Services of Louisiana, Inc.	23-90492
Sheridan Children's Healthcare Services of New Mexico, Inc.	23-90344
Sheridan Children's Healthcare Services of Ohio, Inc.	23-90350
Sheridan Children's Healthcare Services of Virginia, Inc.	23-90360
Sheridan Children's Healthcare Services, Inc.	23-90376

Sheridan Children's Services of Alabama, Inc.	23-90388
Sheridan Emergency Physician Services of Missouri, Inc.	23-90399
Sheridan Emergency Physician Services of North Missouri, Inc.	23-90408
Sheridan Emergency Physician Services of South Florida, Inc.	23-90420
Sheridan Emergency Physician Services, Inc.	23-90435
Sheridan Healthcare of Louisiana, Inc.	23-90444
Sheridan Healthcare of Missouri, Inc.	23-90457
Sheridan Healthcare of Vermont, Inc.	23-90467
Sheridan Healthcare of Virginia, Inc.	23-90477
Sheridan Healthcare of West Virginia, Inc.	23-90484
Sheridan Healthcare, LLC	23-90357
Sheridan Healthcorp of California, Inc.	23-90371
Sheridan Healthcorp, Inc.	23-90384
Sheridan Healthy Hearing Services, Inc.	23-90397
Sheridan Holdings, Inc.	23-90410
Sheridan Hospitalist Services of Florida, Inc.	23-90422
Sheridan InvestCo, LLC	23-90430
Sheridan Leadership Academy, Inc.	23-90440
Sheridan Radiology Management Services, Inc.	23-90451
Sheridan Radiology Services, Inc.	23-90462
Sheridan ROP Services of Alabama, Inc.	23-90472
Sheridan ROP Services of Florida, Inc.	23-90483
Sheridan ROP Services of Virginia, Inc.	23-90490
SHI II, LLC	23-90495
Southeast Perinatal Associates, Inc.	23-90403
Spotlight Holdco LLC	23-90423
St. Lucie Anesthesia Associates, LLC	23-90441
Streamlined Medical Solutions LLC	23-90460
Sun Devil Acquisition LLC	23-90476
Sunbeam Asset LLC	23-90488
Tampa Bay NSC, LLC	23-90496
Templeton Readings, LLC	23-90499
Tennessee Valley Neonatology, Inc.	23-90503
Tiva Healthcare, Inc.	23-90508
Torrance NSC, LLC	23-90513



Towson NSC, LLC	23-90518
Twin Falls NSC, LLC	23-90521
Valley Anesthesiology Consultants, Inc.	23-90522
Valley Clinical Research, Inc.	23-90465
West Fairview Emergency Physicians, LLC	23-90473
Weston NSC, LLC	23-90481
Wilton NSC, LLC	23-90487

6. On October 11, 2023, the Court entered (i) the *Revised Order Confirming the Third Amended Joint Chapter 11 Plan of Reorganization of the EVPS Debtors (Technical Modifications)* [Docket No. 1687] (the “EVPS Confirmation Order”) and (ii) the *Order Confirming the Third Amended Joint Chapter 11 Plan of Reorganization of the AmSurg Debtors (Technical Modifications)* [Docket No. 1688] (the “AmSurg Confirmation Order,” and together with the EVPS Confirmation Order, the “Confirmation Orders”). The Effective Date occurred on November 3, 2023, and the Plans have been substantially consummated. *See Notice of (I) Entry of Orders Confirming (A) the Third Amended Joint Chapter 11 Plan of Reorganization of the EVPS Debtors (Technical Modifications) and (B) the Third Amended Joint Chapter 11 Plan of Reorganization of the AmSurg Debtors (Technical Modifications) and (II) Occurrence of Effective Date* [Docket No. 1807]. The Confirmation Orders are final, non-appealable, and not subject to any pending appeal.<sup>4</sup>

7. To date, approximately 1,558 Proofs of Claim have been filed in these Chapter 11 Cases. The Reorganized Debtors are continuing to review the Proofs of Claim and may object to certain Proofs of Claim in the future (the “Claims Reconciliation Process”).<sup>5</sup> Similarly, the

<sup>4</sup> See AmSurg Confirmation Order, ¶ 149 and EVPS Confirmation Order, ¶162 (“[This] Confirmation Order is a Final Order, and the period in which an appeal must be Filed shall commence upon the entry hereof.”). Pursuant to Bankruptcy Rule 8002, an appeal must have been filed, within fourteen days of entry of the Confirmation Order. No such appeal of the Confirmation Order has been filed.

<sup>5</sup> See Article VII.G of the Plans.

Reorganized Debtors continue to negotiate pending Cure objections and may bring Cure disputes before the Court in the future pursuant to Article VII of the Plans (the “Cure Reconciliation Process”). In addition, pursuant to the Plans, all requests for payment of Professional Claims for services rendered and reimbursement of expenses incurred prior to the Effective Date must be filed no later than forty-five days after the Effective Date (the “Fee Applications”).

8. Although the Reorganized Debtors do not anticipate any further significant contested matters related to their Chapter 11 Cases, miscellaneous motions, applications, pleadings, or other matters or proceedings may arise from time to time (together with the Claims Reconciliation Process, the Cure Reconciliation Process, and the Fee Applications, collectively, the “Remaining Matters”). Any Remaining Matters related to any of the Reorganized Debtors can be filed, administered, and adjudicated in the Remaining Case without any substantive or negative impact on any party in interest.<sup>6</sup>

9. The Reorganized Debtors believe that closing these Chapter 11 Cases other than the Remaining Case is in the best interest of the Reorganized Debtors as it will greatly reduce the fees attributable to remaining in chapter 11.

### **Basis for Relief**

10. Section 350(a) of the Bankruptcy Code provides that “[a]fter an estate is fully administered and the court has discharged the trustee, the court shall close the case.” 11 U.S.C. § 350(a). Bankruptcy Rule 3022, which implements section 350 of the Bankruptcy Code, further provides that “[a]fter an estate is fully administered in a chapter 11

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<sup>6</sup> The Reorganized Debtors reserve all rights to dispute any outstanding claims, and the failure of the Reorganized Debtors to object to any claim filed in these Chapter 11 Cases prior to entry of the Final Decree shall not cause such claim to be deemed allowed. The Reorganized Debtors request that the Court permit any objections to claims against or interests in any of the Chapter 11 Cases to be filed, administered, and adjudicated in the Remaining Case.

reorganization case, the court, on its own motion or on motion of a party in interest, shall enter a final decree closing the case.” Fed. R. Bankr. P. 3022.

11. The term “fully administered” is not defined in the Bankruptcy Code, the Bankruptcy Rules, or the Bankruptcy Local Rules. The Advisory Committee Note to Bankruptcy Rule 3022 (the “Advisory Committee Note”), however, sets forth the following non-exclusive factors to be considered in determining whether a case has been fully administered:

- i. whether the order confirming the plan has become final;
- ii. whether deposits required by the plan have been distributed;
- iii. whether the property proposed by the plan to be transferred has been transferred;
- iv. whether the debtor or the successor of the debtor under the plan has assumed the business or the management of the property dealt with by the plan;
- v. whether payments under the plan have commenced; and
- vi. whether all motions, contested matters, and adversary proceedings have been finally resolved.

Fed. R. Bankr. P. 3022, Advisory Comm. Note (1991). Courts look “to the advisory committee’s notes on Bankruptcy Rule 3022 in seeking guidance as to the meaning of ‘fully administered.’” *In re JCP Props., Ltd.*, 540 B.R. 596, 605 (Bankr. S.D. Tex. 2015).

12. In addition to the factors set forth in the Advisory Committee Note, courts have considered whether the plan of reorganization has been substantially consummated. *See, e.g., In re JCP Props., Ltd.*, 540 B.R. at 605 (commenting that “substantial consummation is the pivotal question here to determine the propriety of closing the [case]”). Section 1101(2) of the Bankruptcy Code defines substantial consummation as the: (A) transfer of all or substantially all of the property proposed by the plan to be transferred; (B) assumption by the debtor or by the

successor to the debtor under the plan of the business or of the management of all or substantially all of the property dealt with by the plan; and (C) commencement of distribution under the plan.

13. Bankruptcy courts have adopted the view that “[the Advisory Committee Note] factors are but a guide in determining whether a case has been fully administered, and not all factors need to be present before the case is closed.” *In re SLI, Inc.*, Case No. 02-12608 (WS), 2005 WL 1668396, at \*2 (Bankr. D. Del. June 24, 2005).

14. Courts have also noted that entry of a final decree is appropriate to stop the accrual of fees paid to the U.S. Trustee pursuant to section 1930 of the United States Code (the “Section 1930 Fees”). See *In re Jay Bee Enters., Inc.*, 207 B.R. 536, 539 (Bankr. E.D. Ky. 1997) (concluding that “it seems appropriate to close this case to stop the financial drain on the debtor” due to accrual of Section 1930 Fees).

15. Here, the foregoing factors weigh strongly in favor of closing all of the Chapter 11 Cases except for the Remaining Case (collectively, the “Affiliate Cases”). The Confirmation Orders are final orders, the Effective Date of the Plans have occurred, and the Plans are substantially consummated.<sup>7</sup> Closing the Affiliated Cases is consistent with the confirmed Plans, which provide that the Reorganized Debtors “shall, promptly after the full administration of the Chapter 11 Cases, File with the Bankruptcy Court all documents required by Bankruptcy Rule 3022 and any applicable order of the Bankruptcy Court to close the Chapter 11 Cases.” AmSurg Plan at Art. XII.M.; EVPS Plan at Art. XII.M.

16. While the Reorganized Debtors acknowledge that the payment of certain claims may be pending, such claims will be paid pursuant to the Plans in the Remaining Case or outside

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<sup>7</sup> Articles IX.D of both the EVPS Plan and the AmSurg Plan provide: “Substantial Consummation... as defined in 11 U.S.C. § 1101(2), shall be deemed to occur on the Effective Date.”

the Chapter 11 Cases in accordance with the Bankruptcy Code and the Plans. Bankruptcy courts in the Fifth Circuit have entered final decrees and closed cases despite certain claims being unpaid. *See, e.g., In re Anachoreta, Inc.*, No. 18-36960 (MI) (Bankr. S.D. Tex. Jun. 26, 2020); *In re EXCO Services, Inc.*, No. 18-30167 (MI) (Bankr. S.D. Tex. Nov. 12, 2019). “The court should not keep [a] case open only because of the possibility that the court’s jurisdiction may be invoked in the future.” Fed. R. Bankr. P. 3022, Advisory Comm. Note (1991). Moreover, the entry of the Final Decree closing the Affiliate Cases would be without prejudice to creditors’ rights to petition the Court to reopen any of such cases pursuant to section 350(b) of the Bankruptcy Code.

17. The Reorganized Debtors will work to resolve the Remaining Matters. To the extent issues arise relating to the Reorganized Debtors, such matters can be resolved under the Remaining Case without keeping the dockets of the Affiliate Cases open. Closing the dockets of the Affiliate Cases will have no impact on the resolution of any remaining claims or distributions, other legal entitlements under the Plans, or the substantive rights of any party in interest, and would stop the accrual of Section 1930 Fees associated with the Affiliate Cases. Accordingly, entry of the Final Decree closing the Affiliate Cases is in the best interests of the Reorganized Debtors and an appropriate use of the Court’s equitable powers pursuant to section 105(a) of the Bankruptcy Code.

### **Notice**

18. The Debtors will provide notice of this motion to the following: (a) the U.S. Trustee for the Southern District of Texas; (b) counsel to the Committee; (c) counsel to the ABL Agent; (d) counsel to the RCF Agent; (e) counsel to the Ad Hoc Group of First Lien AmSurg Lenders; (f) counsel to the AmSurg 2L Group; (g) counsel to the Envision Ad Hoc Group; (h) counsel to the Unsecured Notes Group; (i) counsel to the Consenting Sponsors; (j) the United States Attorney’s Office for the Southern District of Texas; (k) the Internal Revenue Service; (l) the United States

Securities and Exchange Commission; (m) the state attorneys general for states in which the Debtors conduct business; and (n) any party that has requested notice pursuant to Bankruptcy Rule 2002 and Bankruptcy Local Rule 9013-1(d). In light of the nature of the relief requested, no other or further notice is required.

WHEREFORE, the Reorganized Debtors request that the Court enter the Final Decree granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Houston, Texas  
November 20, 2023

*/s/ Rebecca Blake Chaikin*

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*Co-Counsel to the Reorganized Debtors*

*Co-Counsel to the Reorganized Debtors*

**Certificate of Service**

I certify that, on November 20, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Rebecca Blake Chaikin

Rebecca Blake Chaikin